

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**-against-**

**ROBERT J. MUELLER, DEEPROOT FUNDS  
LLC (a/k/a dprt Funds, LLC), AND POLICY  
SERVICES INC.,**

**Defendants,**

**-and-**

**DEEPROOT TECH LLC, DEEPROOT  
PINBALL LLC, DEEPROOT STUDIOS LLC,  
DEEPROOT SPORTS & ENTERTAINMENT  
LLC, DEEPROOT RE 12621 SILICON DR LLC,  
AND ROBERT J. MUELLER, JEFFREY L.  
MUELLER, AND BELINDA G. BREEN, AS CO-  
TRUSTEES OF THE MB HALE OHANA  
REVOCABLE TRUST,**

**Relief Defendants.**

**Civil Action No.: 5:21-cv-785-XR**

**DEFENDANT ROBERT J. MUELLER'S OBJECTIONS TO PLAINTIFF'S  
DESIGNATION OF POTENTIAL WITNESSES**

TO THE HONORABLE COURT:

Pursuant to Fed. R. Civ. P. 26(a)(3) and the Court's Fifth Amended Scheduling Order (ECF No. 102), Defendant Robert J. Mueller submits the following objections to Plaintiff Security and Exchange Commission's (the "SEC") Designation of Potential Witnesses:

**I. WITNESSES THE SEC EXPECTS TO PRESENT**

NO.	NAME AND CONTACT INFORMATION	DEFENDANT'S OBJECTIONS
1.	Charlotte Acker 2313 Brittany Grace	None.

NO.	NAME AND CONTACT INFORMATION	DEFENDANT'S OBJECTIONS
	New Braunfels, TX 78130-8937 (325) 388-8460 (210) 862-9622	
2.	Scott Allen Address unavailable at this time (801) 669-2784	None.
3.	Jeffrey Anderson SEC employee and summary witness, contact through counsel	Undisclosed witness not listed on any disclosures.
4.	James Donnelly 9297 E Caribbean Lane Scottsdale, AZ 85260-2834 (480) 490-0670	None.
5.	John Gray 205 Viticole Lane Little Rock, AK 72223 (713) 705-7973	None.
6.	Robert Kane 3528 West Starr Pass Boulevard Tucson, AZ 85745 (520) 850-1160	None.
7.	Brad Leon 620 Vista View Drive Ashville NC 28803-8572 (828) 273-0205	None.
8.	Robert Mueller	None.
9.	Bill Post 50 California Street, Suite 1900 San Francisco, CA 94111 SEC expert, contact through counsel	None.
10.	Sandra Thompson 4396 N. Atfield Place Tucson, AZ 85719 (520) 405-1402	None.
11.	George C. Williams 1100 NE Interstate 410 Loop, Suite 350 San Antonio, TX 78209 (210) 684-1071	None.

**II. WITNESSES THE SEC MAY PRESENT**

NO.	NAME AND CONTACT INFORMATION	DEFENDANT'S OBJECTIONS
1.	Ken Abramson 23901 Calabasas Road, Suite 1072 Calabasas, CA 91302 (818) 918-4500	None.
2.	Lauren R. "Becca" Adams 12019 Trewell Glen San Antonio, TX 78249 (843) 903-2854	None.
3.	Thomas Andrew c/o Thomas D. Sherman, Esq. Locke Lord, LLP Terminus 200, Suite 1200 3333 Piedmont Road, N.E. Atlanta, GA 30305 (404) 870-4672	None.
4.	Dennis Concilla c/o Mathew S. Brown Carlisle Patchen & Murphy LLP 950 Goodale Blvd. Columbus, OH 43212 (614) 628-0877	None.
5.	Eric Dandridge 120 Rocky Path Boerne, TX 78006 (918) 277-1130/1132	None.
6.	Andrew Federico c/o Mathew S. Brown Carlisle Patchen & Murphy LLP 950 Goodale Blvd. Columbus, OH 43212 (614) 628-0877	None.
7.	Phillip Forret c/o Alan A. Harley, Esq. Associate General Counsel, BDO 135 West 50th Street New York, NY 10020 (212) 885-7351	None.
8.	Patrick Lowe c/o Randy Pulman Pulman, Capuccio & Pullen, LLP 2161 NW Military Hwy, Suite 400 San Antonio, TX 78213	None.

NO.	NAME AND CONTACT INFORMATION	DEFENDANT'S OBJECTIONS
	(210) 222-9494	
9.	Cary Mueller c/o Gordon C. Young, Esq. Barr & Young Attorneys 318-C Diablo Road Danville, CA 94526 (925) 314-9999, ext. 302	None.
10.	Craig Rushforth 2983 North 4000 East Sugar City, ID 83448 (208) 291-7555	None.
11.	Nathan Spradlin c/o Andrew R. Shedlock, Esq. Kutak Rock LLP 60 South Sixth Street, Suite 3400 Minneapolis, MN 55402-4018 (612) 334-5022	None.
12.	Chris Turner c/o Pat H. Autry Branscomb Law 4630 N Loop 1604 W, Suite 206 San Antonio, TX 78249 (210) 598-5401	None.
13.	Gerald Wik c/o Jay A. Dubow, Esq. Troutman Pepper Hamilton Sanders LLP 3000 Two Logan Square Philadelphia, PA 19103 (215) 981-4713	None.
14.	Russell Putnam FactRight 7500 Flying Cloud Dr., Suite 755 Eden Prairie, MN 55344	None.
15.	Representatives from the following entities:	None.
a.	Abramson Accountancy Corporation	None.
b.	American Express	None.
c.	Americus Diamond	None.
d.	Carlile Patchen & Murphy	None.
e.	Cycladic International	None.
f.	deeproot Funds or other related corporate entities	None.
g.	FTI Consulting	None.

NO.	NAME AND CONTACT INFORMATION	DEFENDANT'S OBJECTIONS
h.	Kauai Vacation Rental & Real Estate, Inc.	None.
i.	LUX Catering & Events	None.
j.	Old Republic Title Company	None.
k.	Saint Mary's Hall	None.
l.	Silicon Office Venture, LLC	None.
m.	Tabora Gallery	None.
n.	United Services Automobile Association	None.
o.	The Valhalla Group	None.
p.	The Walt Disney Company	None.
q.	Wells Fargo	None.

Dated: October 20, 2023

Respectfully submitted,

**DAVIS & SANTOS, PLLC**

By: /s/ Jason M. Davis

Jason M. Davis  
 State Bar No. 00793592  
 Email: [jdavis@dslawpc.com](mailto:jdavis@dslawpc.com)  
 Caroline Newman Small  
 State Bar No. 24056037  
 Email: [csmall@dslawpc.com](mailto:csmall@dslawpc.com)  
 719 S. Flores Street  
 San Antonio, Texas 78204  
 Tel: (210) 853-5882  
 Fax: (210) 200-8395

*Counsel for Defendant Robert J. Mueller*

**CERTIFICATE OF SERVICE**

I certify that on October 20, 2023, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system and all counsel of record will receive an electronic copy via the Court's CM/ECF system.

/s/ Jason M. Davis  
 Jason M. Davis